

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:
CRAIG NATHAN SMITH : Case No. 21-21103-CMB
KARLA CRISTINA SMITH :
 : Chapter 13
Debtor(s) :
 : Related to Doc. No. 32

STIPULATION AND ORDER OF COURT

AND NOW, come the Debtors, Craig Nathan Smith and Karla Cristina Smith, and Ronda J. Winnecour, Chapter 13 Trustee, by their undersigned counsel, and Stipulate and Agree as follows:

1. Debtors commenced the within Chapter 13 case on May 3, 2021. Debtors' Chapter 13 plan dated May 25, 2021 was confirmed on an interim basis by order entered June 29, 2021 (Doc. 22).

2. Debtors aforesaid plan provides that the amount necessary to satisfy the liquidation alternative test for confirmation pursuant to 11 U.S.C § 1325(a)(4) totals \$20,573.33.

3. The aforesaid amount indicated in Debtors' plan to satisfy the liquidation alternative test was based on an estimate of the value of Debtors' residence at 155 Dwellington Drive, Valencia, PA 16059 of \$252,138.40.

4. Based on a November 22, 2021 Comparative Market Analysis of the 155 Dwellington Drive property obtained by the Debtors, the parties agree that a more accurate estimate of the property's fair market value is \$315,000.00.

5. Based on a value of \$315,000.00 for the 155 Dwellington Drive property, and giving due consideration to the balance owed on the first mortgage, the amount of exemption available to the Debtors, and the potential costs of liquidating the property,

the parties have agreed that the amount to satisfy the liquidation alternative test is \$39,514.97.

6. The parties' agreement that \$39,514.97 is the amount necessary to satisfy the liquidation alternative test represents a reasonable compromise of the Trustee's potential objections to confirmation arising from a dispute over the valuation of the 155 Dwellington Drive property.

7. Any Chapter 13 plan confirmed in the within case providing for Debtors retaining the 155 Dwellington Drive property shall provide that \$39,514.97 is the amount necessary to satisfy the liquidation alternative test.

8. Within 30 days of the Court's approval of this Stipulation, Debtors shall file an amended Chapter 13 plan consistent with the provisions of this Stipulation.

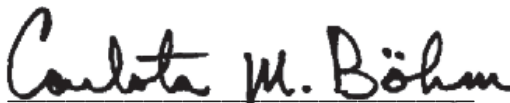
Stipulated and agreed to by:

/s/ James C. Warmbrodt
James C. Warmbrodt, Esquire
Attorney for Chapter 13 Trustee
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
jwarmbrodt@chapter13trusteewdpa.com

/s/ Daniel P. Foster
Daniel P. Foster, Esquire
Foster Law Offices
Attorney for the Debtors
1210 Park Avenue
Meadville, PA 16335
(814) 724-1165
dan@mrdebtbuster.com

So Ordered, this 7th day of January, 2022.

FILED
1/7/22 3:20 pm
CLERK
U.S. BANKRUPTCY
COURT - WDPA


Carlota M. Böhm *dmr*
Chief United States Bankruptcy Court Judge

In re:
Craig Nathan Smith
Karla Cristina Smith
Debtors

Case No. 21-21103-CMB
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Jan 07, 2022

User: dric
Form ID: pdf900

Page 1 of 4
Total Noticed: 57

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
##	Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jan 09, 2022:

Recip ID	Recipient Name and Address
db/jdb	+ Craig Nathan Smith, Karla Cristina Smith, 155 Dwellington Drive, Valencia, PA 16059-2523
15371688	+ AES/Brazus, P.O. Box 61047, Harrisburg, PA 17106-1047
15371689	+ AES/Suntrust, P.O. Box 61047, Harrisburg, PA 17106-1047
15371690	+ American Express, P.O. Box 981537, El Paso, TX 79998-1537
15378195	American Express National Bank, c/o Becket and Lee LLP, PO Box 3001, Malvern PA 19355-0701
15371693	+ Bank of America, 4909 Savarese Circle, Tampa, FL 33634-2413
15371694	+ Caliber Home Loans, 715 South Metropolitan Avenue, Oklahoma City, OK 73108-2054
15371702	+ Collection Service Center, P.O. Box 560, New Kensington, PA 15068-0560
15371709	+ J.P. Morgan Chase Bank Card, P.O. Box 15369, Wilmington, DE 19850-5369
15371710	+ J.P. Morgan Chase Bank Home, 700 Kansas Lane, Monroe, LA 71203-4774
15371711	+ Mariner Finance, 8211 Town Center Drive, Nottingham, MD 21236-5904
15385437	+ NORDSTROM, INC., Jefferson Capital Systems LLC Assignee, Po Box 7999, Saint Cloud MN 56302-7999
15371714	+ National Energy Improvement Fund, LLC, P.O. Box 9000, Fort Washington, PA 19034-9000
15371718	+ Pennymac Loan Services, P.O. Box 514387, Los Angeles, CA 90051-4387
15371721	+ SST/Synovus, 4315 Pickett, Saint Joseph, MO 64503-1600
15371725	+ The Bureaus Inc, 650 Dundee Road, Northbrook, IL 60062-2747
15381765	+ Toyota Credit de Puerto Rico, PO Box 9013, Addison, Texas 75001-9013
15387745	UPMC Health Services, PO Box 1123, Minneapolis, MN 55440-1123

TOTAL: 18

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/PDF: rmscedi@recoverycorp.com	Jan 07 2022 23:18:31	PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021
15371687	Email/Text: Bankruptcy@absoluteresolutions.com	Jan 07 2022 23:14:00	Absolute Resolutions, 8000 Norman Center Drive, Bloomington, MN 55437
15377582	Email/Text: Bankruptcy@absoluteresolutions.com	Jan 07 2022 23:14:00	Absolute Resolutions Investments, LLC, c/o Absolute Resolutions Corporation, 8000 Norman Center Drive, Suite 350, Bloomington, MN 55437
15371692	+ Email/Text: g20956@att.com	Jan 07 2022 23:15:00	AT&T, 208 South Akard Street, Dallas, TX 75202-4206
15371690	+ Email/PDF: bncnotices@becket-lee.com	Jan 07 2022 23:18:31	American Express, P.O. Box 981537, El Paso, TX 79998-1537
15378195	Email/PDF: bncnotices@becket-lee.com	Jan 07 2022 23:18:30	American Express National Bank, c/o Becket and Lee LLP, PO Box 3001, Malvern PA 19355-0701
15392259	+ Email/PDF: rmscedi@recoverycorp.com	Jan 07 2022 23:18:38	Bureaus Investment Group Portfolio No 15 LLC, c/o PRA Receivables Management, LLC, PO Box 41021, Norfolk VA 23541-1021

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15371696	+ Email/PDF: AIS.cocard.ebn@aisinfo.com	Jan 07 2022 23:18:38	Capital One, P.O. Box 30253, Salt Lake City, UT 84130-0253
15371695	+ Email/PDF: AIS.cocard.ebn@aisinfo.com	Jan 07 2022 23:18:35	Capital One, P.O. Box 31293, Salt Lake City, UT 84131-0293
15371697	+ Email/PDF: AIS.cocard.ebn@aisinfo.com	Jan 07 2022 23:18:35	Capital One Bank, P.O. Box 71083, Charlotte, NC 28272-1083
15371698	+ Email/PDF: AIS.cocard.ebn@aisinfo.com	Jan 07 2022 23:18:35	Capital One Bank USA, P.O. Box 31293, Salt Lake City, UT 84131-0293
15371699	+ Email/PDF: AIS.cocard.ebn@aisinfo.com	Jan 07 2022 23:18:31	Capital One Bank/Cabelas, P.O. Box 31293, Salt Lake City, UT 84131-0293
15371701	+ Email/PDF: Citi.BNC.Correspondence@citi.com	Jan 07 2022 23:28:48	Citibank, N.A., P.O. Box 6217, Sioux Falls, SD 57117-6217
15371700	+ Email/PDF: Citi.BNC.Correspondence@citi.com	Jan 07 2022 23:28:50	Citibank, N.A., P.O. Box 6497, Sioux Falls, SD 57117-6497
15371703	+ Email/Text: BNC-ALLIANCE@QUANTUM3GROUP.COM	Jan 07 2022 23:14:00	Comenity Bank, P.O. Box 182125, Columbus, OH 43218-2125
15371704	+ Email/Text: BNC-ALLIANCE@QUANTUM3GROUP.COM	Jan 07 2022 23:14:00	Comenity Bank/J. Crew, P.O. Box 182789, Columbus, OH 43218-2789
15371705	+ Email/Text: BNC-ALLIANCE@QUANTUM3GROUP.COM	Jan 07 2022 23:14:00	Comenity Bank/Victoria's Secret, P.O. Box 182789, Columbus, OH 43218-2789
15371706	+ Email/Text: Bankruptcy.Consumer@dish.com	Jan 07 2022 23:14:00	Dish Network, 90 Inverness Cir E, Englewood, CO 80112-5317
15371707	+ Email/Text: bknotice@ercbpo.com	Jan 07 2022 23:14:00	Enhanced Recovery Company, P.O. Box 57547, Jacksonville, FL 32241-7547
15371708	+ Email/PDF: ais.fpc.ebn@aisinfo.com	Jan 07 2022 23:18:38	First Premier Bank, 3820 North Louise Avenue, Sioux Falls, SD 57107-0145
15385095	+ Email/Text: RASEBN@raslg.com	Jan 07 2022 23:14:00	JPMorgan Chase Bank, N.A., s/b/m/t Chase Bank USA, N.A., c/o Robertson, Anschutz & Schneid, P.L., 6409 Congress Avenue, Suite 100, Boca Raton, FL 33487-2853
15390522	Email/PDF: resurgentbknotifications@resurgent.com	Jan 07 2022 23:28:48	LVNV Funding, LLC, Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587
15385899	+ Email/PDF: ais.midfirst.ebn@aisinfo.com	Jan 07 2022 23:18:37	MidFirst Bank, 999 NorthWest Grand Boulevard, Oklahoma City, OK 73118-6051
15371712	+ Email/Text: bankruptcydpt@mcmcg.com	Jan 07 2022 23:14:00	Midland Credit Management, 320 East Big Beaver, Troy, MI 48083-1238
15385763	+ Email/Text: bankruptcydpt@mcmcg.com	Jan 07 2022 23:14:00	Midland Credit Management, Inc., PO Box 2037, Warren, MI 48090-2037
15371713	+ Email/PDF: ais.midfirst.ebn@aisinfo.com	Jan 07 2022 23:18:37	Midland Mortgage/Midfirst, P.O. Box 268959, Oklahoma City, OK 73126-8959
15371715	+ Email/Text: bnc@nordstrom.com	Jan 07 2022 23:14:30	Nordstrom/TD Bank USA, 13531 East Caley Avenue, Englewood, CO 80111-6504
15372877	+ Email/PDF: cbp@onemainfinancial.com	Jan 07 2022 23:18:31	OneMain Financial, PO Box 3251, Evansville, IN 47731-3251
15371716	+ Email/PDF: cbp@onemainfinancial.com	Jan 07 2022 23:18:34	Onemain, P.O. Box 1010, Evansville, IN 47706-1010
15371717	+ Email/PDF: cbp@onemainfinancial.com	Jan 07 2022 23:18:38	Onemain Financial, P.O. Box 1010, Evansville, IN 47706-1010
15390506	Email/Text: Bankruptcy.Notices@pnc.com	Jan 07 2022 23:14:00	PNC Bank NA, Bankruptcy Department, PO BOX 94982, Cleveland, OH 44101
15371719	Email/Text: Bankruptcy.Notices@pnc.com		

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		Jan 07 2022 23:14:00	PNC Bank, N.A., P.O. Box 3180, Pittsburgh, PA 15230
15371720	Email/Text: signed.order@pfwattorneys.com	Jan 07 2022 23:14:00	Pressler, Felt & Warshaw, L.L.P, c/o Ian Z. Winograd, Esquire, 7 Entin Road, Parsippany, NJ 07054
15371718	+ Email/PDF: ebnotices@pnmac.com	Jan 07 2022 23:28:50	Pennymac Loan Services, P.O. Box 514387, Los Angeles, CA 90051-4387
15385307	+ Email/Text: JCAP_BNC_Notices@jcap.com	Jan 07 2022 23:14:00	Premier Bankcard, LLC, Jefferson Capital Systems LLC Assignee, Po Box 7999, Saint Cloud MN 56302-7999
15378379	Email/Text: bnc-quantum@quantum3group.com	Jan 07 2022 23:14:00	Quantum3 Group LLC as agent for, Aqua Finance, PO Box 788, Kirkland, WA 98083-0788
15372152	+ Email/PDF: gecsed@recoverycorp.com	Jan 07 2022 23:18:37	Synchrony Bank, c/o of PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021
15371722	+ Email/PDF: gecsed@recoverycorp.com	Jan 07 2022 23:18:31	Synchrony Bank/BSTB, P.O. Box 965036, Orlando, FL 32896-5036
15371723	+ Email/PDF: gecsed@recoverycorp.com	Jan 07 2022 23:18:31	Synchrony Bank/Gap, P.O. Box 965005, Orlando, FL 32896-5005
15371724	+ Email/PDF: gecsed@recoverycorp.com	Jan 07 2022 23:18:37	Synchrony Bank/Husqvarna, P.O. Box 965036, Orlando, FL 32896-5036
15371725	+ Email/PDF: tbiedi@PRAGroup.com	Jan 07 2022 23:18:31	The Bureaus Inc, 650 Dundee Road, Northbrook, IL 60062-2747
15371726	+ Email/Text: TFS_Agency_Bankruptcy@toyota.com	Jan 07 2022 23:14:00	Toyota Motor Credit, P.O. Box 9786, Cedar Rapids, IA 52409-0004
15371727	+ Email/Text: TFS_Agency_Bankruptcy@toyota.com	Jan 07 2022 23:14:00	Toyota Motor Credit, Two Walnut Groove Drive, Horsham, PA 19044-2219

TOTAL: 43

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr		MIDFIRST BANK
15381351	*	American Express National Bank, c/o Becket and Lee LLP, PO Box 3001, Malvern PA 19355-0701
15383153	*+	Mariner Finance, LLC, 8211 Town Center Drive, Nottingham, MD 21236-5904
15371691	##+	Aqua Finance Inc., 2600 Pine Ridge Boulevard, Wausau, WI 54401-7800

TOTAL: 1 Undeliverable, 2 Duplicate, 1 Out of date forwarding address

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jan 09, 2022

Signature: /s/Joseph Speetjens

District/off: 0315-2

User: dric

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Total Noticed: 57

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on January 7, 2022 at the address(es) listed below:

Name	Email Address
Daniel P. Foster	on behalf of Joint Debtor Karla Cristina Smith dan@mrdebtbuster.com katie@mrdebtbuster.com;kaitlyn@mrdebtbuster.com;kristen@mrdebtbuster.com;fosterlaw@ecf.inforuptcy.com
Daniel P. Foster	on behalf of Debtor Craig Nathan Smith dan@mrdebtbuster.com katie@mrdebtbuster.com;kaitlyn@mrdebtbuster.com;kristen@mrdebtbuster.com;fosterlaw@ecf.inforuptcy.com
Maria Miksich	on behalf of Creditor MIDFIRST BANK mmiksich@kmlawgroup.com
Office of the United States Trustee	ustpregion03.pi.ecf@usdoj.gov
Ronda J. Winnecour	cmecf@chapter13trusteewdpa.com

TOTAL: 5